

**BRENNEKE DECLARATION**  
**EXHIBIT D**



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December 31, 2019

Andrea Brenneke  
Assistant Attorney General  
Office of the Attorney General  
Civil Rights Division  
800 Fifth Avenue, Suite 2000  
Seattle, Washington 98104

**RE: *Washington v. The GEO Group, Inc.*, 17-cv-05806-RJB  
Post-Mandamus Production of Financial Information**

Counsel,

GEO is in receipt of your letter dated December 13, 2019, which details various perceived deficiencies in GEO's financial document production. This letter serves to alert the State that at this time GEO does not believe the issue is ripe for Court intervention and to suggest that, should this letter not be sufficient, that the Parties identify a time to meet and confer further.

**Requested Excel Files:**

In your letter, you requested certain documents in excel or native format. The letter specifically asks GEO to identify whether there are any underlying excel files for the following bates numbered documents:

- GEO-State 299184 to GEO-State 299193;
- GEO-State 299184;
- GEO-State 229185;
- Exhibit 252.

GEO has reviewed the documents produced and disagrees that the documents produced are "difficult to read." Nevertheless, GEO is investigating whether any additional data related to these documents exists, and if so, in what format it is stored. Given the holidays, and various vacation schedules, GEO must wait until some individuals return from pre-planned vacations to obtain full and complete answers. To that end, GEO will provide the State with an update about what documents exist (if any) and a proposal for producing those documents by **January 8, 2020**.

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Assistant Attorney General  
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**VWP Reimbursement Summary:**

In your letter, you also request that information be added to GEO-State 299194 for the dates between 2005 and September 2009. GEO is investigating the feasibility of collecting this data, or if there is a less burdensome alternative. GEO will provide the State with an update about what documents exist (if any) and a proposal for producing those documents by **January 8, 2020**.

**Keefe Files:**

In addition to the documents already produced, your letter has asked for GEO to locate and produce Keefe records for all of 2005 – 2012, February 2013, April-September 2013, April and June of 2014, March and August of 2015, January of 2016, and October – December of 2019. GEO produced the records for August 2015 at GEO-State 297470. AS for the other documents, GEO is in the process of locating and collecting these documents and will produce them (or identify their bates numbers) on a rolling basis. Should GEO be unable to identify any specific records, it will notify the State by **January 15, 2019**.

**Redacted Letter:**

Finally, the State asks GEO to produce "an unredacted letter" but does not identify that letter by bates number. It also asks for documents "underlying" that redacted letter. In order to identify whether this is possible, and whether the redactions were made by ICE or GEO, please provide GEO with the bates numbers of the letter. Please also provide the portion of the Court's Order that you contend supports your position that you are entitled to the financial data related to the redacted letter.

Should you have any additional questions, I am available for a call after 1:00 P.M. MST Friday, January 3, 2020, or Thursday, January 9, 2020, before noon MST.

Best,

*s/Adrienne Scheffey*